

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaira A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF MOTION TO SEAL
JOINT SUBMISSION IN RESPONSE TO
DKT. 147, 147-1, 159, 159-1 RE: STATUS
OF DISCOVERY DISPUTES**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the parties’
7 Joint Submission In Response To Dkt. 147, 147-1, 159, 159-1 Re: Status of Discovery Disputes
8 (“Joint Submission”). In making this request, Google has carefully considered the relevant legal
9 standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this request with
10 the good faith belief that the information sought to be sealed consists of Google’s confidential and
11 proprietary information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Joint
13 Submission, attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential technical
15 information regarding the various types of Google’s internal identifiers/cookies and their proprietary
16 functions, that Google maintains as confidential in the ordinary course of its business and is not
17 generally known to the public or Google’s competitors.

18 5. Such confidential information reveals Google’s internal strategy, system design, and
19 system capacity regarding various important products, and falls within the protected scope of the
20 Protective Order entered in this action. *See* Dkt. 81 at 2.

21 6. Public disclosure of such confidential information could affect Google’s competitive
22 standing as competitors may alter their identifier system designs and practices relating to competing
23 products. It may also place Google at an increased risk of cyber security threats, as third parties may
24 seek to use the information to compromise Google’s identifier systems.

25 7. For these reasons, Google respectfully requests that the Court order the identified
26 portions of the Joint Submission to be sealed.

27 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
28 correct. Executed in Los Angeles, California on May 26, 2021.

1
2 DATED: May 26, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

3
4
5 By 

Viola Trebicka

Attorney for Defendant